

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>

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**CERTIFICATION OF C. BRETT VAUGHN IN OPPOSITION TO DEFENDANTS’  
MOTION TO COMPEL PRODUCTION OF TESTING AND OTHER MATERIALS IN  
THE POSSESSION OF CLASS EXPERT, DR. RON NAJAFI**

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I, C. BRETT VAUGHN, hereby certify as follows:

1. I am an attorney at law within the State of Kansas with the Hollis Law Firm, P.A., and serve as a Court-appointed Member of the Plaintiffs’ Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this certification in opposition to Defendants’ motion to compel production of testing and other materials in the possession of class expert, Dr. Ron Najafi.

2. The facts set forth in this certification are based upon my personal knowledge, information, and belief, unless otherwise stated.

3. Attached hereto as **Exhibit A** is a true and accurate copy of Valisure’s Metformin Citizen Petition.

4. Attached hereto as **Exhibit B** is a true and accurate copy of Ron Najafi’s April 25, 2022 Declaration.

5. Attached hereto as **Exhibit C** is a true and accurate copy of ZHP00007221 at 223.

6. Attached hereto as **Exhibit D** is a true and accurate copy of PRINSTON0075797 at 807-811, 879, 958, 964, 970, 022-024, 031-033.

7. Attached hereto as **Exhibit E** is a true and accurate copy of USP's webpage on nitrosamine impurities.

8. Attached hereto as **Exhibit F** is a true and accurate copy of Dr. Jason Clevenger's March 18, 2022 Deposition Transcript.

9. Attached hereto as **Exhibit G** is a true and accurate copy of Exponent/Dr. Jason Clevenger's Expert Report.

10. Attached hereto as **Exhibit H** is a true and accurate copy of the March 30, 2022 CMC Transcript.

11. Attached hereto as **Exhibit I** is a true and accurate copy of Health Canada's Testing Results.

12. Attached hereto as **Exhibit J** is a true and accurate copy of the FDA's ARB Recall List.

13. Attached hereto as **Exhibit K** is a true and accurate copy of the FDA's Valsartan Not Recalled List.

I hereby certify that the aforementioned statements made by me are true. I am aware that if any of the aforementioned statements made by me are willfully false, I am subject to punishment.

Dated: April 25, 2022

Respectfully Submitted,

By: /s/ C. Brett Vaughn  
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